



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 29 2011

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Allison
President
Jet Finishers, Inc.
79 Bond Street
Elk Grove Village, IL 60007

Re: Notice of Violation
Jet Finishers, Inc.
Elk Grove Village, Illinois

Dear Mr. Allison:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Jet Finishers, Inc. The NOV is being issued under Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413(a). We find that you are in violation of the Illinois State Implementation Plan, including the construction permits issued by the Illinois Environmental Protection Agency, for your Elk Grove Village, Illinois facility (the Facility).

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your Facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The technical contact in this matter is Jennifer Wilson. You may call her at (312) 353-3115 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Newton". The signature is fluid and cursive, with a large initial "C" and "N".

Cheryl L. Newton

Director

Air and Radiation Division

cc: Ray Pilapil, Manager
Compliance and Systems Management Section
Illinois Environmental Protection Agency

Enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Jet Finishers, Inc.
Elk Grove Village, IL**

Proceedings Pursuant to
the Clean Air Act
42 U.S.C. § § 7401 *et seq.*

)
)
)
)
)
)
)
)
)
)

NOTICE OF VIOLATION

EPA-5-11-IL-16

NOTICE OF VIOLATION

The Administrator of the United States Environmental Protection Agency (U.S. EPA) is issuing this Notice of Violation (NOV) under Section 113(a) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a). U.S. EPA finds that Jet Finishers, Inc. in Elk Grove Village, Illinois (Jet Finishers) is in violation of the Illinois State Implementation Plan (SIP), including the construction permits issued to Jet Finishers by the Illinois Environmental Protection Agency (IEPA) as follows:

Regulatory Authority

1. Section 113(a) of the CAA, 42 U.S.C. § 7413(a), authorizes the Administrator to issue an NOV whenever, among other things, the Administrator finds that any person has violated or is in violation of a requirement or prohibition of an applicable implementation plan or permit.
2. On May 31, 1972, U.S. EPA approved Illinois Pollution Control Board (IPCB) Rule 103 as part of the federally enforceable SIP for the State of Illinois. 37 Fed. Reg. 10842. IPCB Rule 103 has been recodified at 35 IAC §§ 201.142 and 201.143.
3. IPCB Rule 103(a)(1) [35 IAC 201.142] states that no person shall cause or allow the construction of any new emission source or any new air pollution control equipment, or cause or allow the modification of any existing emission source or air pollution control equipment, without first obtaining a construction permit from the IEPA.
4. IPCB Rule 103(b)(1) [35 IAC 201.143] states that no person shall cause or allow the operation of any emission source or new air pollution control equipment, for which a construction permit is required, without first obtaining an operational permit from IEPA.

5. On May 19, 1998, the U.S. EPA approved 35 IAC §§ 218.204 and 218.205 as part of the federally enforceable SIP for the State of Illinois. 63 Fed. Reg. 27489. Section 218.204 establishes emission limitations for coating various objects depending on the type of coating and method of drying. Section 218.204 states, "Except as provided in Sections 218.205, 218.207, 218.208, and 218.212 of this Part, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating." Section 218.204 also states: "Compliance with this Subpart must be demonstrated through ... the recordkeeping and reporting requirements specified in Section 218.211(c) of this Part except where noted." Owners may comply with Sections 218.205, 218.207, 218.208, or 218.212 instead of 218.204.
6. Section 218.205 specifies the daily limits for various types of coating. Section 218.205(b) regulates miscellaneous metal coating, Section 218.205(d) regulates heavy off-highway vehicles, and Section 218.205(g) regulates plastic parts coating.
7. Alternatively, owners or operators of coating facilities subject to 35 IAC § 218.204 may comply with 35 IAC § 218.208 instead of 35 IAC § 218.204. 35 IAC § 218.08 was approved by the U.S. EPA as part of the IL SIP on February 13, 1996. 61 Fed. Reg. 5511. Section 218.208 states that coating lines that emit 15 lbs VOM/day or less before the application of a capture system and control device are exempt from the requirements of Section 218.204. If an owner or operator chooses to comply with Section 218.208, he must also comply with the recordkeeping and reporting requirements specified in 35 IAC § 218.211(a). Section 218.208 also states that once a category of coating lines is subject to the limitations in 35 IAC § 218.204, the coating lines are always subject to that Section.
8. 35 IAC § 218.211 contains requirements for record keeping and reporting. This section was approved as part of the Illinois SIP on May 19, 1998 by the U.S. EPA. 63 Fed. Reg. 27489. Record keeping is required for all of the compliance options for coating processes. In addition, this section also requires owners to certify that their coating processes are in compliance with the method they have chosen. If an owner desires to change the method of compliance, 35 IAC § 218.211 states that the IEPA needs to be notified 30 calendar days before an owner or operator changes the method of compliance on a coating line.

Jet Finishers Facility and Factual Background

9. Jet Finishers owns and operates a painting and coating facility at 79 Bond Street in Elk Grove Village, IL (the Facility). The Facility has been in operation since August 2005.
10. The Facility has two coating lines: one for powder coating and another that can do powder or liquid coating. The Facility also has masking, a liquid coating batch process, a powder coating batch process, and silk screening.
11. On December 22, 2010, representatives of U.S. EPA visited the Facility to perform an

inspection of the Facility.

12. During the inspection, the U.S. EPA representatives requested to see Jet Finishers' records relating to the coating processes at the Facility. Representatives from the company stated that they were unable to provide U.S. EPA with those records.
13. On April 14, 2011, representatives of the U.S. EPA hand-delivered a Section 114 information request to Jet Finishers. The Section 114 request required a response within 14 days.
14. By letter dated April 29, 2011, received by U.S. EPA on May 13, 2011, Jet Finishers responded to the Section 114 request.
15. In its Section 114 response, Jet Finishers stated that it began construction on all of the processes listed in paragraph 10, above, in 2004.
16. In its 114 response, Jet Finishers stated that all coating and painting operations started at the Facility in 2005.
17. In its 114 response, Jet Finishers stated that the following have all been painted or coated at the Facility: "miscellaneous metal parts, extreme performance, as described in Section 218.204(j)(2)(a) as well as Section 218.204(j)(2)(b); all other as described in Section 218.204(j)(4)(A) and Section 218.204(j)(4)(B); heavy off-highway vehicle products as described in Section 218.204(k)(1) and Section 218.204(k)(1) [and Section 218.204(k)(1)]; and plastic parts and business machines as described in Section 218.204(o)(1), Section 218.204(c)(2), Section 218.204(o)(3) and Section 218.204(o)(4)."
18. In its Section 114 response, Jet Finishers stated it was using either compliant coatings or the daily weighted average of the liquid coating operations as its method of compliance for the liquid coating booths and the liquid coating lines, but stated that it has no records to demonstrate that the Facility is in compliance with these methods.
19. In its Section 114 response, Jet Finishers stated that the VOC emissions from the silk screening processes are and have always been below 15 lbs/day.
20. In its Section 114 response, Jet Finishers did not provide any records for the coating processes at the Facility including the powder coating line, the line that can do powder or liquid coating, the liquid coating batch process, the powder coating batch process, the silk screening and the paint mixing.
21. In its Section 114 response, Jet Finishers did not provide any certifications submitted to the IEPA for each of its coating processes.

Permit Background

22. On September 7, 2004, the IEPA issued Jet Finishers a joint construction and lifetime operating permit #04070024 for two powder coating lines, three manual silk screening printing stations, and solvent wipe cleaning operations. The permit lists the application as being received on July 13, 2004. This permit did not, however, include the liquid coating line, the liquid coating batch process, or the powder coating batch process.
23. Paragraph 2 of permit #04070024 states, "The VOM emissions from silk screen printing and solvent wipe cleaning operations shall not exceed 0.1 tons/month and 1.0 tons/year. Compliance with annual limits shall be determined from a running total of 12 months of data."
24. Paragraph 4 of permit #04070024 states, "The Permittee shall maintain monthly records of the following items:
 - a. names and amounts of coatings and solvents used (lb/month, ton/year);
 - b. VOM content of materials in item (a) (wt %); and
 - c. VOM emission calculations (lb/month, ton/year)."
25. IEPA issued to Jet Finishers construction permit #04100034 on December 22, 2004. The permit is for the construction of:
 - a. two appliance powder coating booths controlled by cyclone/filter systems;
 - b. nine appliance liquid coating booths controlled by filters and an afterburner;
 - c. three curing ovens controlled by an afterburner; and
 - d. three manual silk screen printing stations with solvent wipe cleaning operations as described in the application.The permit did not, however, authorize the construction of dry-off oven #2 or the parts washer on the liquid coating line.
26. Paragraph 3 of permit #04100034 requires the compliance of metal coating operations to "be achieved through the use of a capture system and control device that provides 81% reduction in the overall VOM emissions and [the] control device has 90% efficiency."
27. Paragraph 4 of permit #04100034 states that "VOM emissions from the nine coating booths shall not exceed 1.5 tons/month and 14.0 tons/year. Compliance with annual limits shall be determined from a running total of 12 months of data."
28. Paragraph 6 of permit #04100034 states that "Operations and VOM emissions from the paint mixing shall not exceed the following limits:
 - a. paint process rate: 5.0 tons/month and 50.0 tons/year;
 - b. emission factor weight %: 1.5%; and
 - c. VOM emissions: 0.1 tons/month and 0.75 tons/year."

29. Paragraph 10 a. of permit #04100034 states that, "The afterburners shall be in operation at all times when the associated emission units are in operation and emitting air contaminants."
30. Paragraph 12 of permit #04100034 states that, "The Permittee shall maintain monthly records of the following items:
- a. name and amount of each coating applied in each coating booth;
 - b. VOM content of each coating in pounds of VOM per gallon of solids;
 - c. compliance and demonstration with emission standard in 40 CFR 60.452 in accordance with procedures established by 40 CFR 60.453;
 - d. names and amounts of coatings, inks and solvents used (tons/month, tons/year);
 - e. VOM and HAP content of materials in item (d) (weight %); and
 - f. VOM and HAP emissions with supporting calculations (tons/month, tons/year)."
31. Paragraph 5 of permit #04070024 and paragraph 13 of permit #04100034 states that, "All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection."
32. Paragraph 16 of permit #04100034 states that, "The new equipment may be operated for a period of 18 months under this Construction Permit."

Violations

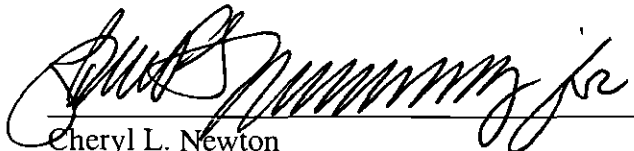
33. By failing to obtain a construction permit for dry-off oven #2 on the liquid coating line and the parts washer on the liquid coating line, Jet Finishers violated and continues to violate 35 IAC § 201.142.
34. By failing to obtain an operating permit for the liquid coating line, the liquid coating batch process, and the powder coating batch process, Jet Finishers violated and continues to violate 35 IAC § 201.143 and Paragraph 16 of construction permit # 04100034.
35. By failing to certify the compliance method of its various lines and processes, Jet Finishers violated 35 IAC § 218.211.
36. By failing to keep records of the name and identification number of the coatings, volume of coatings, and VOM content of the coatings used at its liquid coating line, Jet Finishers has violated 35 IAC § 218.211.
37. By failing to keep records of the name and identification number of the coatings, volume of coatings, and VOM content of the coatings used at its liquid coating booths, Jet

Finishers has violated Paragraphs 4, 12, and 13 of construction permit #04100034 and 35 IAC § 218.211.

38. By failing to keep records of the volumes and the VOM content of the coatings used during the paint mixing processes as well as VOM emissions, Jet Finishers has violated Paragraphs 6 and 13 of construction permit #04100034.
39. By failing to keep records of the types of coatings, volume of coatings, VOM content of the coatings, and VOM emissions of the coatings used in the silk screening process and the solvent wipe cleaning operations, Jet Finishers has violated Paragraphs 2, 4, and 5 of construction permit #04070024.
40. By failing to add a capture system and control device for its metal coating operations that provides 81% reduction in the overall VOM emissions and has a 90% efficiency, Jet Finishers has violated Paragraph 3 of construction permit #04100034.
41. By failing to construct, install, and operate an afterburner that processes the emissions from the liquid coating booths and three curing ovens, Jet Finishers has violated Paragraph 10 a. of construction permit #04100034.

6/29/11

Date



Cheryl L. Newton

Director

Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent a Notice of Violation, No. EPA-5-11-IL-16, by Certified Mail, Return Receipt Requested, to:

David Allison, President
Jet Finishers, Inc.
79 Bond Street
Elk Grove Village, IL 60007

I also certify that I sent copies of the Notice of Violation of Violation by first-class mail to:

Ray Pilapil, Manager
Bureau of Air
Compliance and Enforcement Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, IL 62702

On the 30 day of June 2011.

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7670 4540